

EXHIBIT B

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF NEW JERSEY
3
4

5 HIS ALL HOLINESS,)
6 BARTHOLOMEW I, THE)
7 ARCHBISHOP OF)
8 CONSTANTINOPLE, NEW ROME,)
9 AND ECUMENICAL PATRIARCH,)
10 et al.,)

11 Plaintiffs,)

12 vs.)

) Civil No.

13) 3:18-CV-17195-MAS-ZNQ
14)
15)

16 PRINCETON UNIVERSITY,)
17)
18)

19 Defendant.)
20
21
22
23
24

25 The Interpreted Zoom video deposition of
26 ALEXANDER APOSTOLIDIS, taken before Richard Derrick
27 Ehrlich, Registered Merit Reporter, Certified
28 Realtime Reporter, taken pursuant to the Federal
29 Rules of Civil Procedure, commencing at 6:00 a.m.,
30 on the 18th day of May, 2021.

A P P E A R A N C E S

On behalf of the Plaintiffs:

George A. Tsougarakis
HARTMANN DOHERTY ROSA BERMAN & BULBULIA LLC
433 Hackensack Avenue
Suite 1002
Hackensack, NJ 07601
201.441.9056
gtsougarakis@hdrbb.com
Eric Blumenfeld
Erin Pamukcu
Nicholas Velonis
Sigrid Jernudd
HUGHES HUBBARD & REED LLP
One Battery Park Plaza
New York, NY 10004-1482
212.837.6000
eric.blumenfeld@hugheshubbard.com
erin.pamukcu@hugheshubbard.com
nicholas.velonis@hugheshubbard.com
sigrid.jernudd@hugheshubbard.com

On behalf of the Defendant:

Steven A. Goldfarb
Samuel C. Sneed
HAHN LOESER & PARKS LLP
200 Public Square
Suite 2800
Cleveland, OH 44114
216.621.0150
sag@hahnlaw.com
ssneed@hahnlaw.com

Also Present:

Videographer, Michael Prager
Michele Stopera Freyhauf

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1 your dining room table length is?

2 MR. TSOUGARAKIS: Objection.

3 THE DEPONENT: Well, I can only answer that
4 hypothetically, which means I will not be saying
5 the truth. So if I'm not going to be able to
6 say the truth, I don't know.

7 BY MR. GOLDFARB:

8 Q An estimation is by definition not precise. So
9 I'm simply asking you for an estimate.

10 MR. TSOUGARAKIS: Objection.

11 THE DEPONENT: I have not hidden from you
12 that I had asked for the professional help of
13 Mr. Papazoglou.

14 BY MR. GOLDFARB:

15 Q When did you first speak with Mr. Papazoglou?

16 MR. TSOUGARAKIS: Objection.

17 INTERPRETER: Okay. I hope I got this
18 right.

19 THE DEPONENT: I first asked for his help
20 in 2013. We started working together intensely
21 in 2016, which is the time when I had asked him
22 to be the author of the volume that he composed
23 for me.

24 \\

1 BY MR. GOLDFARB:

2 Q Mr. Papazoglou --

3 MR. TSOUGARAKIS: Objection.

4 BY MR. GOLDFARB:

5 Q Mr. Papazoglou contacted you shortly after you
6 became the Metropolitan of Drama; isn't that
7 true?

8 A Well, when I met him in 2013, as I have told
9 you, I was the Metropolitan in Drama.

10 Q Isn't it true that Mr. Papazoglou came to you
11 shortly after 2005, before 2013, to speak with
12 you?

13 A No, I don't recall such a thing. I arrived here
14 on the 19th of November of 2005. I didn't
15 have the desire to speak with Papazoglou.

16 Q I'm talking about whether Mr. Papazoglou wanted
17 to speak with you. He contacted you shortly
18 after you took your position as Metropolitan and
19 asked to speak with you about the stolen
20 manuscripts, didn't he?

21 MR. TSOUGARAKIS: Objection.

22 THE DEPONENT: I don't know what Papazoglou
23 desired to do. I cannot speak on behalf of what
24 Papazoglou was thinking.

1 BY MR. GOLDFARB:

2 Q Did Mr. Papazoglou call you, email you, or write
3 to you shortly after you assumed the position of
4 Metropolitan in 2005?

5 MR. TSOUGARAKIS: Objection.

6 THE DEPONENT: I don't have any such
7 communication in my hands. Whatever
8 correspondence there was between myself and
9 Papazoglou for the issues that we are discussing
10 here you already have in your hands.

11 Now Mr. Steven, dear Steven is reminding me
12 of an incident in the Bible with certain persons
13 from Herodian try to entrap Jesus Christ by some
14 clever questions.

15 I have never said such a thing, nor have I
16 made any statements that I had any communication
17 with Mr. Papazoglou in 2005.

18 BY MR. GOLDFARB:

19 Q I appreciate that. My question was: Isn't it
20 true that Mr. Papazoglou called you, emailed
21 you, or wrote to you shortly after you became
22 Metropolitan to speak with you regarding stolen
23 manuscripts?

24 MR. TSOUGARAKIS: Objection.

1 The translation is bad. I'll just object.

2 You've heard the question again. I would
3 ask you to retranslate the question now you've
4 heard it again. That's all.

5 INTERPRETER: Can I please hear the
6 question again?

7 MR. TSOUGARAKIS: Sorry, Steve.

8 BY MR. GOLDFARB:

9 Q Sure. When you received this email, did you
10 discuss with Mr. Papazoglou what were the
11 documents that he had sent to Dionysios 30 years
12 earlier?

13 A No, because I understood that it was pertaining
14 to the stolen items from -- with the Bulgarians,
15 which had just recently appeared with judava.

16 Q Why would you think that the documents sent
17 30 years ago did not refer to Princeton?

18 MR. TSOUGARAKIS: I think she's gone again,
19 right?

20 VIDEOGRAPHER: Shall we go off the record?

21 MR. GOLDFARB: Yes, let's go off the
22 record.

23 VIDEOGRAPHER: We are going off the record.
24 The time is 12:33 p.m.

1 (Break.)

2 VIDEOGRAPHER: We are back on the record.

3 The time is 12:35 p.m.

4 Please proceed.

5 BY MR. GOLDFARB:

6 Q Did you ask Mr. Papazoglou what documents he had
7 sent to Dionysios?

8 A No.

9 Q From this email, you knew that Mr. Papazoglou
10 had been in communication with Metropolitan
11 Dionysios, correct?

12 MR. TSOUGARAKIS: Objection.

13 THE DEPONENT: That he sent one file. I
14 didn't know that he had communication.

15 BY MR. GOLDFARB:

16 Q You knew that he had sent documents 30 years ago
17 to Dionysios, right?

18 A No.

19 Q And you've never asked Mr. Papazoglou about any
20 of his communications with Dionysios; is that
21 correct?

22 A I don't know if he had any other communication
23 with him.

24 Q If the Metropolis wanted to learn that